

**SAN FRANCISCO INTERNATIONAL AIRPORT
AUTOMATED LICENSE PLATE RECOGNITION POLICY**

A. Purpose

The purpose of this policy is to define (1) the appropriate uses for Automated License Plate Recognition (ALPR) data, (2) authorized users of the Airport's LPR technology, and (3) audit and retention requirements.

B. Definitions

"Automated License Plate Recognition System" or "ALPR" means a searchable computerized database resulting from the operation of one or more mobile or fixed cameras combined with computer algorithms to read and convert images of registration plates and characters they contain into computer-readable data.

"Automated License Plate Recognition end-user" or "ALPR end-user" means a person who accesses or uses the ALPR system.

"ALPR information" means information or data collected through the use of the ALPR system.

"ALPR operator" means a person or group with oversight responsibility for the ALPR system.

C. Authorized Purpose of Collecting and Retaining ALPR Data

1. Parking Management Division

The Airport's Parking Management Division may collect and use ALPR data to troubleshoot parking transactions, reconcile revenues, and provide receipts to customers. The Parking Management Division may also release ALPR data to the San Francisco Police Department-Airport Bureau ("SFPD-AB") the San Mateo County Sheriff, and/or the Federal Bureau of Investigations ("FBI") to determine whether any vehicles have been stolen or are otherwise associated with criminal activity.

2. Landside and Ground Transportation Units

The Airport's Landside and the Ground Transportation Units may collect and use ALPR data to generate billing when transponders on commercial passenger transportation vehicles are inoperative or missing; reconcile revenues; provide proof of vehicle activity when permitted operators challenge the issuance of an administrative citation; support issuance of citations when they have been appealed by operators; and support the Airport's legal challenges to operators who conduct business on the Airport's roadways without a permit. Landside and Ground Transportation Units may also release ALPR data to the SFPD-AB, the San Mateo County Sheriff, and/or the Federal Bureau of Investigations to determine whether any vehicles have been stolen or are otherwise associated with criminal activity.

D. Authorized Users

1. Parking Management Personnel

0941, Director of Aviation and Parking Management (1)

0932, Parking Manager (2)

1823, Sr. Financial Analyst (1)

1408, Principle Clerk (1)

Parking Operations Contractor Staff
General Manager (1)
Assistant General Manager (1)
Operating Managers (2)
Lead Cashiers (22 full time 7 on call)
Parking System Maintenance Contractor Staff
Field Service Technicians (2)

2. Landside Personnel

0933, Landside Operations Senior Manager (1)
5290, Planner IV (3)
5289, Planner (1)
0931 Ground Transportation Compliance & Hearing Officer (1)
5207, Traffic Engineer (1)
5201, Junior Engineer (2)
1824, Principal Administrative Analyst (1)
1406, Senior Clerk (1)

3. Ground Transportation Unit

0931, GTU Manager (1)
1823, GTU Assistant Manager (1)
9206, GTU Customer Service Specialist
9236, Ground Transportation Technician (7)
9144, Ground Transportation Compliance Investigator (6)
7313, Auto Shop Vehicle Inspector (3)
Contractor Software Engineers (2, through mid-2018)

E. Access to ALPR System

Operator: The system administrator or “operator” is SFO’s Information Technology and Telecommunications (“ITT”) division, which is responsible for: (1) confirming that all users have completed required ALPR training, (2) assigning each ALPR user a unique user and password designation, (3) auditing the ALPR system on an annual basis to confirm data access, including who accesses information, the date of access and what information was accessed, and (4) destroying ALPR data upon expiration of retention date.

Users: ALPR Users are those individuals assigned to the Airport’s Landside, Ground Transportation and Parking Management facilities who have a need to access ALPR data to perform their job duties. Their job titles are set forth in section D, above. All ALPR Users shall be fully trained on ALPR access and appropriate use of ALPR data. ALPR Users are strictly prohibited from accessing or disclosing ALPR data except as required by their assigned job duties.

F. Training

The Airport's ITT division provides annual staff training on the secure handling of ALPR data.

G. Data Retention

In accordance with the SFO Record Retention and Destruction Policy, ALPR data will be stored per the following schedule: Landside/GTU – 4.5 years; Parking Management – images are retained for 90 days and data is retained for 4.5 years.

H. ALPR Data Security

The following protocols shall be followed to ensure data security:

1. All network equipment and servers containing sensitive data are maintained in a secured location and accessed only by authorized personnel.
2. ALPR servers and network equipment are continuously monitored.
3. ITT maintains a log of successful and unsuccessful logon attempts, changes in user accounts, whether user logs have been modified, network threats, and resource access.
4. All SFO workstations and servers are patched regularly.
5. All sensitive data stored on the servers are backed up regularly and a copy saved offsite; LPR data saved offsite are encrypted.
6. SFO's network is protected behind a firewall and data transmitted outside SFO's network to SFO cloud-based partners are encrypted via SSL/TLS. Data at rest offsite are also encrypted.
7. SFO only shares ALPR information with authorized law enforcement partners, as described in § C, above. SFO does not share this information with commercial or other private entities or individuals.

I. Accuracy of ALPR Data

In the event Landside, GTU, or Parking Management become aware of an ALPR data error, ITT will correct all associated files.